

Page 89

1 A No, sir.  
 2 Q All right. On any other issues?  
 3 A No, sir.  
 4 Q All right. Now, there was talk, for example, were  
 5 you familiar with allegations and information, I should say  
 6 not just allegations, that private investigators were used by  
 7 the Clinton campaign in 1992?  
 8 A I only know what I read in the newspapers, the  
 9 allegations. I didn't know there was --  
 10 Q And what do you recall reading in the newspaper  
 11 about that topic?  
 12 A Oh, I remember that they were accused of hiring  
 13 detectives in the '92 campaign to check out backgrounds of --  
 14 I think it was Gennifer Flowers.  
 15 Q And who do you recall reading had been hired to do  
 16 that?  
 17 A There are three detectives that seem to be  
 18 interchangeable in all of these stories: Lenzner, not  
 19 Palladin but --  
 20 Q Palladino?  
 21 A Palladino and then there was -- seems that there  
 22 was one more. And I don't remember who was in the report I  
 23 read, but it seems that it's always these guys.  
 24 Q And where was the third person from?  
 25 A I don't know.

Page 90

1 Q Do you know where Palladino is from? Where his  
 2 offices are?  
 3 A The West Coast somewhere.  
 4 Q San Francisco area?  
 5 A I don't know. Just on the West Coast.  
 6 Q And where --  
 7 A Because I read that.  
 8 Q Have you ever discussed this matter with either of  
 9 the Clintons?  
 10 A No, sir.  
 11 Q Have you ever read about Mrs. Clinton having been  
 12 involved with private investigators early in her legal  
 13 career?  
 14 A No, sir.  
 15 Q Never had any conversation along those lines?  
 16 A No, sir.  
 17 Q Is there anything else, any other information that  
 18 you have about private investigators?  
 19 A No, sir.  
 20 Q All right. To your knowledge, there have been no  
 21 private investigators used, hired, by or behalf of, the  
 22 President since the Monica Lewinsky story broke? Is that  
 23 correct?  
 24 A To my knowledge, that's correct.  
 25 Q All right.

Page 91

1 A But I'm the first to admit I don't have much  
 2 knowledge. But, no, I've never heard anything.  
 3 Q Are you -- you say to your knowledge. Have you  
 4 heard otherwise and just aren't sure and therefore don't want  
 5 to --  
 6 A No, sir. I've not heard otherwise from anybody.  
 7 Ever.  
 8 Q You haven't heard anything about this topic?  
 9 A No, sir.  
 10 MR. BENNETT: All right.  
 11 MR. APPERSON: All right. We'll get you to step  
 12 out for just a moment.  
 13 THE WITNESS: Me?  
 14 MR. APPERSON: Yes.  
 15 THE WITNESS: Oh, okay.  
 16 MR. APPERSON: Hold outside the door and I'll come  
 17 and tell you whether you're free or we'll need you back in  
 18 just a second.  
 19 (Witness excused. Witness recalled.)  
 20 BY MR. APPERSON:  
 21 Q All right, sir. You're still under oath.  
 22 A Okay.  
 23 Q Do you recall the interview on "The Today Show"  
 24 with the First Lady wherein she referenced the right-wing  
 25 conspiracy?

Page 92

1 A Yes, sir.  
 2 Q Did you have any involvement in the discussions  
 3 with the First Lady prior to her appearance on "The Today  
 4 Show"?  
 5 A I did not.  
 6 Q Okay. Were you asked to be involved in preparing  
 7 her for that interview?  
 8 A No, sir.  
 9 BY MR. BENNETT:  
 10 Q Do you know of anyone who did?  
 11 A No, sir. I don't -- I don't think anybody did.  
 12 I think she knew what she was going to do and kept it to  
 13 herself.  
 14 BY MR. APPERSON:  
 15 Q You had no discussions with the First Lady about  
 16 the upcoming interview?  
 17 A No, sir.  
 18 Q Even the existence of it?  
 19 A No, sir.  
 20 Q Okay. Did you know --  
 21 A Wait. When you say "existence of it," I'm sorry,  
 22 would you --  
 23 Q Yes, sir. In other words, did you discuss with the  
 24 First Lady the fact that she was going to appear on "Today"  
 25 for an interview?